REMARKS

The Office Action dated June 21, 2010 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-3, 6-11, 13-16, 18-21, and 23-30 are now pending in this application. Claims 1-11, 13-16, and 18-30 stand rejected. Claims 4, 5, 17, and 22 have been canceled.

The rejection of Claims 1-11, 13-16, and 18-30 under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 7,536,475 to Collier, et al. (hereinafter referred to as "Collier") is respectfully traversed.

Initially, on page 4 of the Office Action, the Examiner asserts that at column 3, lines 49-56, Collier describes, in an alternative embodiment, a web server and database module electrically connected to a network module via an ACM backplane and a network. Applicants respectfully disagree. Collier describes a web server subsystem electrically coupled to a module via a backplane. Nowhere does Collier describe or suggest network module is electrically connected to the web server and database module via an ACM backplane, as recited in the present claims.

More specifically, Collier describes an automation control module (ACM) system (10) that includes an ACM (12), a SOAP/XML and web server system (14), and a computer (16). An ACM backplane (24) facilitates the exchange of data between input/output (I/O) modules (26) and ACM (12). Notably, Collier does not describe or suggest a network module located outside of a computer and outside of a web server and database module, wherein the network module is electrically connected to the web server and database module via an ACM backplane, wherein the network module is configured to receive a request for a file from the computer via a network, and wherein the network module is configured to send the request for the file to the web and server database through the ACM backplane.

Claim 1 recites a web-enabled automation control module (ACM) system including "a network module located outside of said computer and said web server and database module,

said network module electrically connected to said web server and database module via an ACM backplane, said network module configured to receive the request for the file from said computer via a network; said network module configured to send the request for the file to said web and server database through the ACM backplane."

Applicants respectfully submit that Collier does not describe or suggest a web-enabled automation control module (ACM) system as recited in Claim 1. More specifically, Applicants respectfully submit that Collier does not describe or suggest a network module located outside of a computer and outside of a web server and database module, wherein the network module is electrically connected to the web server and database module via an ACM backplane, wherein the network module is configured to receive a request for a file from the computer via a network, and wherein the network module is configured to send the request for the file to the web and server database through the ACM backplane. Rather, Collier merely describes that a web server subsystem can be electrically coupled to a backplane. Nowhere does Collier describe or suggest that the web server subsystem is connected to a network (or network module) via a backplane. For example, the backplane recited in Claim 1 connects a network module and a web server database module; however, Collier merely describes that a web server subsystem can be electrically coupled to a backplane separately from an ACM. In this embodiment described in Collier, the web server subsystem could communicate with modules (e.g., modules 26) via a backplane, but the web server subsystem could not communicate with a network (alleged network module), via a backplane.

Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Collier.

Claims 2, 3, 6-10, and 19 depend from independent Claim 1. When the recitations of Claims 2, 3, 6-10, and 19 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2, 3, 6-10, and 19 likewise are patentable over Collier.

Claim 11 recites a method for managing and controlling an automation control module (ACM) system, wherein the method includes "sending a request for a file from a

computer through a network to at least one network module located outside of the computer and outside a web server and database module; sending the request from the at least one network module through an ACM backplane to a web server located within the web server and database module; storing the file in a database of the web server and database module; requesting, by the web server, ACM data from an ACM central processing unit (CPU) based on tag functions embedded in the file; sending the requested ACM data from the ACM CPU to the web server and database module, wherein the ACM CPU is coupled directly to the web server and database module; retrieving the file from the database via the web server; embedding the ACM data in the file to facilitate transferring the ACM data to the at least one network module in response to the request; and transmitting the file from the web server to the computer via the at least one network module and the network."

Applicants respectfully submit that Collier does not describe or suggest a method for managing and controlling an automation control module (ACM) system as recited in Claim 11. More specifically, Applicants respectfully submit that Collier does not describe or suggest a method for managing and controlling an ACM system that includes sending a request for a file from at least one network module through an ACM backplane to a web server located within a web server and database module. Rather, Collier merely describes that a web server subsystem can be electrically coupled to a backplane. Nowhere does Collier describe or suggest that the web server subsystem is connected to a network via a backplane. For example, the backplane recited in Claim 11 connects a network module and a web server database module; however, Collier merely describes that a web server subsystem can be electrically coupled to a backplane separately from an ACM. In this embodiment described in Collier, the web server subsystem could communicate with modules (e.g., modules 26) via a backplane, but the web server subsystem could not communicate with a network (alleged network module), via a backplane.

Accordingly, for at least the reasons set forth above, Claim 11 is submitted to be patentable over Collier.

Claims 13-16 and 18 depend from independent Claim 11. When the recitations of Claims 13-16 and 18 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 13-16 and 18 likewise are patentable over Collier.

Claim 20 recites a method for managing and controlling an automation control module (ACM) system, wherein the ACM system includes at least one network module located outside of a computer, and wherein the at least one network module is electrically connected to a network and a web server and database module is electrically connected to the at least one network module and located outside the at least one network module. The method includes "receiving a request for a file from the computer through the network by the at least one network module located outside of the computer and outside the web server and database module; storing the file in a database of the web server and database module; parsing the file for tag functions used to determine desired ACM data to be returned to the computer; and transmitting the desired ACM data to be embedded in the file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to the computer via the ACM backplane and the at least one network module in response to the request, wherein the ACM CPU is coupled directly to the web server and database module."

Applicants respectfully submit that Collier does not describe or suggest a method for managing and controlling an automation control module (ACM) system as recited in Claim 20. More specifically, Collier does not describe or suggest a method for managing and controlling an ACM system that includes transmitting desired ACM data to be embedded in a file from an ACM central processing unit (CPU) to facilitate transferring the ACM data to a computer via an ACM backplane and at least one network module. Rather, Collier merely describes that a web server subsystem can be electrically coupled to a backplane. Nowhere does Collier describe or suggest that the web server subsystem is connected to a network via a backplane. For example, the backplane recited in Claim 20 connects a network module and a web server database module; however, Collier merely describes that a web server subsystem can be electrically coupled to a backplane separately from an ACM. In this embodiment described in Collier, the web server subsystem could communicate with

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modules (e.g., modules 26) via a backplane, but the web server subsystem could not communicate with a network (alleged network module), via a backplane.

Accordingly, for at least the reasons set forth above, Claim 20 is submitted to be patentable over Collier.

Claims 21, 23, and 24 depend from independent Claim 20. When the recitations of Claims 21, 23, and 24 are considered in combination with the recitations of Claim 20, Applicants submit that dependent Claims 21, 23, and 24 likewise are patentable over Collier.

Claim 25 recites a method for managing and controlling network traffic by utilizing at least one network module and a web server and database module located outside the at least one network module. The method includes "receiving, by a first network module located outside of a computer and outside the web server and database module, a message from the computer via a network; storing a file requested in the message in a database of the web server and database module; parsing the file to determine a set of requested ACM data based on tag functions within the file; embedding the requested ACM data in the message in response to execution of the tag functions; and transferring the message from the first network module via an automation control module (ACM) backplane to the web server and database module to facilitate transferring the message to the first network module in response to a request, wherein the message is transferred from an ACM central processing unit (CPU) that is coupled directly to the web server and database module."

Applicants respectfully submit that Collier does not describe or suggest a method for managing and controlling network traffic, as recited in Claim 25. More specifically, Applicants respectfully submit that Collier does not describe or suggest a method for managing and controlling network traffic by transferring a message from a first network module via an automation control module (ACM) backplane to a web server and database module to facilitate transferring the message to a first network module in response to a request. Rather, Collier merely describes that a web server subsystem can be electrically coupled to a backplane. Nowhere does Collier describe or suggest that the web server subsystem is connected to a network via a backplane. For example, the backplane recited in

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Claim 25 connects a network module and a web server database module; however, Collier merely describes that a web server subsystem can be electrically coupled to a backplane separately from an ACM. In this embodiment described in Collier, the web server subsystem could communicate with modules (e.g., modules 26) via a backplane, but the web server subsystem could not communicate with a network (alleged network module), via a backplane.

Accordingly, for at least the reasons set forth above, Claim 25 is submitted to be patentable over Collier.

Claims 26-30 depend from independent Claim 25. When the recitations of Claims 26-30 are considered in combination with the recitations of Claim 25, Applicants submit that dependent Claims 26-30 likewise are patentable over Collier.

For at least the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1-11, 13-16, and 18-30 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action are respectfully solicited.

Respectfully submitted,

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